



Gwendolyn
Massenburg /R5/USEPA/US
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To
Subject Chemical Recovery Systems, Inc. Shallow Monitoring Wells-
Proposed Change

Sent Via Electronic Mail and USPS

October 16, 2003

Mr. Douglas A. McWilliams, Esq.
Squire, Sanders, & Dempsey, L.L.P
4900 Key Tower
127 Public Square
Cleveland, OH 44114-1304

**Re: Chemical Recovery Systems (CRS), Inc., Shallow Monitoring Wells-Proposed
Change to the Work Plan**

Dear Mr. McWilliams:

This is a written follow-up to the oral approval given to Mr. Gelman on Thursday, Oct. 16, 2003 regarding the shallow monitoring well - proposed change to the Work Plan. U.S. EPA is in agreement with the following changes to the approved work plan:

- No soil samples shall be collected for chemical analysis from the shallow monitoring wells, unless unconsolidated materials are encountered greater than four feet below surface grade.
 - The unconsolidated materials shall be defined as truly unconsolidated material i.e. bedrock and not the fill material overlying the sandstone bedrock, or the weathered material usually found above the bedrock.
- No soil samples shall be collected for chemical analysis from the deep monitoring wells, unless unconsolidated materials are encountered greater than 16 feet below surface grade.
 - The unconsolidated materials shall be defined as truly unconsolidated material i.e. bedrock and not the fill material overlying the sandstone bedrock, or the weathered material usually found above the bedrock.
- Eliminate the installation of the three shallow monitoring wells adjacent to GP-6, GP-14 and GP-16; based on the analytical results from the groundwater samples collected from the three temporary monitoring points.
- Eliminate the installation of the shallow monitoring well adjacent to GP-29.
- Install the shallow monitoring well adjacent to GP-24. The same conditions shall apply as in the first bullet item above, regarding the soil sample collection during the installation of

shallow monitoring wells.

For further clarification, in the event there is a limited amount of soil sample available, the preference is to have the analyses performed for the volatile organic compound and forgo the analyses of semi-volatile organic compounds, as done in the previous sampling event.

If you have any questions or additional information is needed, please do not hesitate to contact me.

Sincerely,
Gwendolyn Massenburg
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